



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 27 2002

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: Region 3 Request for Approval of an Emergency Removal Action Memorandum Amendment at the Dimock Residential Groundwater Site in Dimock Township, Susquehanna County, Pennsylvania

FROM: Gilberto Irizarry, Director
Program Operations and Coordination Division

TO: Lawrence M. Stanton, Director
Office of Emergency Management

This memorandum requests your concurrence with the response proposed under the Region 3 Action Memorandum Amendment request for ongoing actions at the Dimock Residential Groundwater Site. The actual approval of this action memo is done by the Region 3 Approving Official (Associate Director of the EPA Region 3, Office of Preparedness and Response, Hazardous Site Cleanup Division) or designee. Region 3 has submitted this action memo for concurrence to OEM under the nationally significant or precedent-setting policy. The site is not on the National Priorities List (NPL).

Based on information from the draft final action memo amendment and discussions with Region 3 and other pertinent headquarters offices, I recommend that we concur with the action proposed by Region 3. Please indicate your decision on the attached concurrence memorandum.

Attachment

AR400015



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Concurrence on a Request for Funding Increase for a Removal Action at the Dimock Residential Groundwater Site, Intersection of PA Routes 29 & 2024 Dimock Township, Susquehanna County, Pennsylvania

FROM: *Dennis P. Carney*
Dennis P. Carney, Associate Division Director
Office of Preparedness and Response
Hazardous Site Cleanup Division (3HS30) **DATE:** June 27, 2012

TO: Lawrence M. Stanton, Director
Office of Emergency Management

ATTN: Gilberto Irizarry, Director
Program Operations and Coordination Division

ISSUE:

EPA Region III is requesting concurrence on the attached "Action Memorandum Amendment/Summary and Request for Additional Funding at the Dimock Residential Groundwater Site, Intersection of PA Routes 29 & 2024 Dimock Township, Susquehanna County, Pennsylvania. The OSC has determined that additional funds in the amount of \$100,000 are needed to continue to mitigate the health concerns initially determined to exist at four homes while final actions are underway to complete an on-going assessment of private well drinking water quality at 64 homes in the area. This action also formally documents previous funding increases and a scope change where the OSC was provided verbal approvals within the Region after HQ concurrence on each of those modifications was received.

The OSC has determined that this Site meets the criteria for a Removal Action under Section 300.415 of the NCP. I am requesting your concurrence on the request for a funding increase for the removal action because this action appears to be nationally significant or precedent setting. Upon receipt of your concurrence, the Region intends to approve this Action Memorandum Amendment. That approval would be provided pursuant to EPA regional delegation of authority 14-2 which gives the Associate Division Director of the EPA Region III, Office of Preparedness and Response, Hazardous Site Cleanup Division authority to approve CERCLA removal actions.

AR400016

The Action Memorandum Amendment is attached for your review. My approval awaits your concurrence.

Concur



Director, Office of Emergency Management



Date

According to the redelegation, authority to non-concur remains with the Assistant Administrator. If you choose not to concur on this action, please forward this memorandum to the Assistant Administrator.

Non-Concur:

Assistant Administrator for Solid Waste
and Emergency Response

Date

cc: Mathy Stanislaus, AA-OSWER

Attachment: Draft Action Memorandum Amendment/Summary and Request for Additional Funding

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Date: June 27, 2012

Subject: Action Memorandum Amendment/Summary and Request for Additional Funding
for a Removal Action at the Dimock Residential Groundwater Site, Intersection of
PA Routes 29 & 2024
Dimock Township, Susquehanna County, Pennsylvania

From: Richard M. Fetzner, On-Scene Coordinator
Eastern Response Branch (3HS31)



To: Dennis P. Carney, Associate Division Director
Hazardous Site Cleanup Division (3HS30)

I. PURPOSE

The purpose of this Action Memorandum Amendment is to document previous verbal approvals and to request an increase in funds for an emergency removal action to prevent, limit, or mitigate the threats posed by the presence of hazardous substances at the Dimock Residential Groundwater Site (the "Site"), pursuant to Section 104(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(a). The Site is located in Dimock Township, Susquehanna County, Pennsylvania. The OSC has initiated a removal site evaluation in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. Part 300. Initially, the OSC determined that funds in the amount of \$100,000 were needed to mitigate the human health concern at four homes and therefore proposed the actions included in the Action Memorandum approved on January 19, 2012 (attached). That action included provision of alternate water to four homes and home well sampling at approximately 61 homes within the Site area. That action continues. In addition, the OSC received two additional funding increases (documented by Special Bulletins A & C attached), bringing the current site ceiling to \$500,000. The OSC has finished the sampling of an actual 64 first round homes and re-sampling of the 4 homes where alternate water is being provided. It is anticipated that until results are received and evaluated, the provision of alternate water to these homes will continue. Therefore, at this time, additional funding is needed to continue providing alternate water to these homes. Please refer to the attached Action Memorandum and Special Bulletins A, B, & C for further information.

AR400018

II. SITE CONDITIONS AND BACKGROUND

A. Background

1. From the end of January 2012 to the middle of March 2012, EPA collected drinking water samples from 61 homes. Those samples were analyzed for numerous chemicals. The data is posted on the EPA OSC web page (www.epaosc.org/dimock_residential_groundwater). In May 2012, EPA collected samples at 3 additional first round homes and also resampled the four homes being provided with alternate water. At present, EPA has not offered any specific conclusions regarding this data, but plans to conduct a comprehensive review of all the EPA data associated with this site.

Please refer to the attached Action Memorandum and Special Bulletins A, B, & C for further information.

III. QUANTITIES/TYPE OF SUBSTANCES PRESENT

Based upon EPA's first round of sampling, the following maximum concentrations of metals were found at the wellhead: arsenic – 90.7 ug/L, barium – 3530 ug/L, and manganese – 947 ug/L. At the home where the arsenic concentration was found to be 90.7 ug/L at the well (91.1 ug/L at the tap), the owner was offered alternate water by EPA. Special Bulletin B (attached) documents that action. As of this date, the owner of that home has declined EPA's alternate water after an initial delivery. That home currently has an arsenic filter unit installed and maintained by Cabot. Cabot continues to collect and analyze samples from this home. EPA has confirmed that this resident does not request any sampling assistance from EPA.

Please refer to the attached Action Memorandum and Special Bulletins A, B, & C for further information on the background and the original basis for initiating a removal action.

A. National Priorities List

The Dimock Residential Groundwater Site is not on the CERCLA National Priorities List (NPL).

B. State and Local Authorities' Roles

Please refer to the attached Action Memorandum and Special Bulletins A, B, & C for further information.

IV. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

Twice EPA has sampled the four homes currently receiving alternate water. The first round of data from those four homes did not reflect levels of contaminants consistent with the original data that caused EPA to take an action under Superfund. However, EPA decided to

confirm those results and provide improved certainty to the residents by taking another round of samples and analyze for metals only. Metal contamination was the basis for EPA action originally. EPA is in the midst of finalizing and completing its evaluation of those 2nd round data results for the four homes.

ATSDR issued an ATSDR Record of Activity (AROA) in December 2011 and is presently preparing an up-to-date health consultation based upon a thorough data review and evaluation. Please refer to the prior Action Memorandum and Special Bulletins A, B, & C (all attached) for further information.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Action

1. Proposed Action Description

Please refer to the attached Action Memorandum and Special Bulletins A, B, & C for further information. The OSC has finished the sampling of an actual 64 first round homes and re-sampling of the 4 homes where alternate water is being provided. It is anticipated that until results are received and evaluated, the provision of alternate water to these homes will continue. Therefore, at this time, additional funding is needed to continue providing alternate water to these homes. The following additional action is being considered and may be taken, if deemed appropriate upon final Agency discussions.

Evaluate selected existing home water treatment systems, in order to fill any data gaps and to collect information needed to determine the system's effectiveness in removing detected substances. Funding for this activity may be covered by 104(b) assessment authorities as appropriate.

2. Contribution to Remedial Performance

A remedial action is not anticipated and therefore this removal action is not inconsistent with any remedial action, which could be proposed in the future.

3. Applicable or Relevant and Appropriate Requirements ("ARARs")

Actions will be conducted in compliance with Applicable or Relevant and Appropriate Regulations (ARARs) to the extent practicable considering the exigencies of the situation, in accordance with 40 CFR 300.415(j). EPA is considering both Federal and State Maximum Contaminant Levels and other Federal and State drinking water references. These references are being considered when the sampling results are evaluated to determine whether an action under Superfund is warranted.

A. Estimated Direct Costs

Extramural Costs	Current	Proposed
Regional Allowance Costs: (ERRs Contractors and Subcontractors)	\$ 475,000	\$575,000
Other Extramural Costs Not Funded From the Regional Allowance: START Contractor	\$ 10,000	\$ 10,000
Subtotal, Extramural	\$ 485,000	\$585,000
Extramural Costs Contingency	\$ 15,000	\$ 15,000
Removal Action Project Ceiling	\$ 500,000	\$600,000

B. Total Cost Summary

The total EPA costs for this removal action based upon full-cost accounting practices are estimated below as follows:¹

Direct Extramural Costs	\$600,000
Direct Intramural Costs	\$200,000
Total Direct Costs	\$800,000
Indirect Cost (67.13% x Direct Costs)	\$537,040
Total Costs (Direct and Indirect)	\$1,337,040

VI. EXPECTED CHANGE IN SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If no action is taken, certain residents may utilize untreated well water which poses a potential public health concern.

VII. OUTSTANDING POLICY ISSUES

Please refer to the attached Action Memorandum and Special Bulletins A, B, & C for further information.

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000.

VIII. RECOMMENDATION

This Action Memorandum Amendment and attachments represent the selected Removal Action for the Dimock Residential Groundwater Site in Dimock Township, Susquehanna County, Pennsylvania, developed in accordance with CERCLA, as amended, and is consistent with the NCP. This decision is based on the administrative record for the Site. The administrative record consists of the following documents

1. 1/13/12 "Dimock Home Well Data" memo from EPA Toxicologist Dawn Ioven.
2. ATSDR AROA Issued 12/28/11.
3. Summary of Portions of data received by EPA and reviewed by the OSC.
4. PADEP Consent Order and Agreement, dated December 15, 2010.
5. EPA Data Review Memo, January 13, 2012.
6. EPA 104e request to Cabot, January 6, 2012
7. EPA sampling and analysis database.(added since the last Action Memorandum)

Conditions at the Site meet the Removal Action requirements of Section 300.415(b) of the NCP and I recommend your approval of the proposed removal action and exemption from the statutory limits. The total project ceiling, if approved, will be \$600,000. Of this, as much as, \$575,000 comes from the Regional removal allowance. Please indicate your approval or disapproval below.

Action by the Approving Official:

I have reviewed the above-stated facts and, based upon those facts and the information compiled in the documents described above, I hereby approve/disapprove the selected removal action.

APPROVED:

Gerald T. Holt f DPC

Dennis P. Carney, Associate Division Director
Hazardous Site Cleanup Division
EPA Region 3

DATE

6/28/12

DISAPPROVED:

Dennis P. Carney, Associate Division Director
Hazardous Site Cleanup Division
EPA Region 3

DATE